

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	DATE FILED: _____
v.	:	CRIMINAL NO. _____
EDWARD CASIGNE	:	VIOLATIONS:
JESSE VELEZ	:	18 U.S.C. § 371 (conspiracy to
SCOTT BOLDEN	:	manufacture and pass counterfeit
AVERY FITZPATRICK	:	currency - 1 count)
	:	18 U.S.C. § 471 (manufacturing
	:	counterfeit currency - 1 count)
	:	18 U.S.C. § 472 (possession of counterfeit
	:	currency - 1 count)
	:	18 U.S.C. § 2 (aiding and abetting)
	:	Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From on or about December 4, 2009, through on or about December 9, 2009, in the Eastern District of Pennsylvania and elsewhere, defendants

**EDWARD CASIGNE,
JESSE VELEZ,
SCOTT BOLDEN, and
AVERY FITZPATRICK**

conspired and agreed, together and with others unknown to the grand jury, to commit offenses against the United States, that is: (1) falsely making, forging, and counterfeiting obligations and securities of the United States with intent to defraud, in violation of Title 18, United States Code, Section 471; and (2) passing, uttering, concealing, and possessing falsely made, forged, and counterfeited obligations and securities of the United States with intent to defraud, in violation of

Title 18, United States Code, Section 472.

MANNER AND MEANS

It was part of the conspiracy that:

2. Defendants EDWARD CASIGNE, JESSE VELEZ, SCOTT BOLDEN, and AVERY FITZPATRICK used a multi-function printer/copier/scanner to manufacture more than \$2,000 in counterfeit United States currency (Federal Reserve Notes or “FRNs”) in twenty dollar and ten dollar bill denominations.

3. Defendants EDWARD CASIGNE, JESSE VELEZ, SCOTT BOLDEN, and AVERY FITZPATRICK rented hotel rooms in which they manufactured counterfeit United States currency.

4. Defendants EDWARD CASIGNE, JESSE VELEZ, SCOTT BOLDEN, and AVERY FITZPATRICK bought and attempted to buy merchandise with the counterfeit United States currency in twenty dollar and ten dollar bill denominations.

OVERT ACTS

In furtherance of the conspiracy, and to effect the objects of the conspiracy, defendants EDWARD CASIGNE, JESSE VELEZ, SCOTT BOLDEN, and AVERY FITZPATRICK , and others unknown to the grand jury, committed the following overt acts, among others, in the Eastern District of Pennsylvania, and elsewhere:

1. On or about December 4, 2009, in Philadelphia, defendant JESSE VELEZ, using the name of his brother S.V., rented a hotel room in order to manufacture counterfeit United States currency in twenty dollar and ten dollar bill denominations.

2. On or about December 7, 2009, in Trevose, defendant JESSE VELEZ, using the name of his brother S.V., rented another hotel room in order to manufacture counterfeit United States currency in twenty dollar and ten dollar bill denominations.

3. Between on or about December 4, 2009, and on or about December 7, 2009, defendants EDWARD CASIGNE, JESSE VELEZ, SCOTT BOLDEN, and AVERY FITZPATRICK used a multi-function printer/copier/scanner to manufacture more than \$2,000 in counterfeit United States currency in twenty dollar and ten dollar bill denominations.

On or about December 7, 2009:

4. In Bensalem, Pennsylvania, defendant JESSE VELEZ passed counterfeit United States currency.

5. In Langhorne, Pennsylvania, defendant EDWARD CASIGNE attempted to purchase merchandise with approximately \$680 in counterfeit United States currency.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 2 through 4 and Overt Acts 1 through 5 of Count One of this indictment are incorporated here.

2. Between on or about December 4, 2009, and on or about December 7, 2009, in the Eastern District of Pennsylvania, defendants

**EDWARD CASIGNE,
JESSE VELEZ,
SCOTT BOLDEN, and
AVERY FITZPATRICK,**

with intent to defraud, falsely made, forged, and counterfeited, and aided and abetted the false making, forging, and counterfeiting of, obligations and securities of the United States, that is, counterfeit United States currency (Federal Reserve Notes or “FRNs”) in twenty dollar and ten dollar bill denominations by the use of a multi-function printer/copier/scanner.

In violation of Title 18, United States Code, Sections 471 and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 2 through 4 and Overt Acts 1 through 5 of Count One of this indictment are incorporated here.

2. Between on about December 4, 2009, and on or about December 7, 2009, in the Eastern District of Pennsylvania, defendants

**EDWARD CASIGNE,
JESSE VELEZ,
SCOTT BOLDEN, and
AVERY FITZPATRICK,**

with intent to defraud, passed, uttered, concealed, and possessed, and aided and abetted the passing, uttering, concealing, and possession of, falsely made, forged, and counterfeited obligations and securities of the United States, that is, counterfeit United States currency (Federal Reserve Notes or “FRNs”) in twenty and ten dollar bill denominations.

In violation of Title 18, United States Code, Sections 472 and 2.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections 471 and 472, as set forth in this indictment, defendants

**EDWARD CASIGNE,
JESSE VELEZ,
SCOTT BOLDEN, and
AVERY FITZPATRICK**

shall forfeit to the United States of America all counterfeits of any obligations or other securities of the United States; any articles, devices, and other things made, possessed, or used to falsely make, forge, counterfeit, pass, and possess counterfeits of obligations or other securities of the United States; any material and apparatus used and fitted and intended to be used in the making of such counterfeits; and all property constituting, or derived from, proceeds the defendants obtained directly or indirectly as a result of such violations.

All pursuant to Title 18, United States Code, Sections 492 and 982.

A TRUE BILL:

FOREPERSON

**MICHAEL L. LEVY
United States Attorney**